REMARKS

Claims 1-13, 15-35, 37, 39-43, 45-48, 51-62, and 64-74 are pending.

Claims 1-13, 15-35, 37, 39-43, 45-48, 51-62, and 64-74 stand rejected.

Claims 1, 3, 4, 6-11, 13, 19, 21, 22, 24, 26, 27, 29, 30, 32, 33, 34, 39, 48, 51, 52, 55, 56, 62, 69, 70, and 71 have been amended.

Drawings Objection

The drawings are objected to for failing comply with 37 C.F.R. § 1.84(p)(5) because Figure 4 is missing a reference "400". Applicant has enclosed a Replacement Figure 4 that includes the omitted "400". No new matter has been added.

Applicants respectfully request withdrawal of the objection to the drawings.

Claim Objections

Claims 19-23, 39, 51-62, 64-69, and 70-72 stand objected to. Applicants have appropriately amended the objected to Claims to address all objections.

Accordingly, Applicants respectfully request withdrawal of the objections to the claims.

Claim Rejections - 35 U.S.C. § 112

Claim 2 stands rejected under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement. The Office Action stated that, "The specification and original claims do not provide support for the software configuration engine generating the pre-generated product configuration."

Claim 2 recites, "The computer system of claim 1 further comprising: a software configuration engine stored in the memory to generate the pre-generated product configurations."

Applicants respectfully submit that at least page 8, line 25-page 9, line 13 and page 31, lines 5-14. Page 8, line 25-page 9, line 13 state in part:

Using a website employing such a software architecture [], a user is able to ... generate comparable product configurations, store the product configurations(s) and perform related tasks. The foregoing functionalities are provided by a software module [] that enables the identification of products based on their features (i.e., attributes). ... Moreover, by persisting configuration information throughout such a system , a user need not re-enter product information, thus enhancing the user's purchasing experience.

Page 31, lines 5-14 state in part:

Database manager 2120 can be configured to perform this translation in a number of different ways. For example, database manager 2120 can generate the set of feature combinations that users are likely to desire from the information in product databases 2110(1)-(N) for entry into database 2060. Alternatively, database manager 2120 can be configured to generate all possible product configurations from product databases 2120(1)-(N), for entry into database 2060. Another possible scenario is to have research manager 2120 generate a minimal set of configurations from product databases 2110(1)-(N), and then add configurations dynamically to database 2060 as such configurations are requested by users of the websites employing website architecture 2000.

Thus, Applicants respectfully submit that the cited portions of the Specification support Claim 2. Applicants also note that the invention is defined by the claims, and the claims are not limited to specific embodiments in the specification.

Applicants respectfully request withdrawal of the rejection.

(I) Claim Rejections - 35 U.S.C. § 103

Claims 1, 4-6, 13, 15-19 and 73 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U. S. Patent No. 6,901,430 issued to Smith (hereinafter "*Smith*") in view of official notice. Applicants respectfully traverse the rejection.

Smith relates to "An online system of locating consumer product having specific configuration in an enterprise production pipeline and inventory." *Smith*, Abstract.

Claim 1 recites two distinct processes that "identify one or more of the pre-generated product configurations" that are conditioned upon the type of data received. *Smith* teaches that products can be in different locations, i.e. "in an enterprise production pipeline and inventory." *Smith*, Abstract. **However,** *Smith* teaches and suggests only one (1) process of identifying a

product. The Office Action cites *Smith* col. 10, lines 14-27 and corresponding Figure 5 as teaching both:

> a filter service module, stored in the memory, to process **product attribute information** received by the needs analysis module in accordance with the product configuration information stored in the database in order to identify one or more of the pre-generated product configurations stored in the database that meet requirements of the received product attribute information;
>
> and
>
> a configuration service module, stored in the memory, to process **product identifier information** received by the needs analysis module to identify one or more of the pre-generated product configurations stored in the database that corresponds to the received product related data

However, *Smith* relevantly teaches only that "the consumer accesses the system via portal web pages, and enters desired vehicle configuration and options, as shown in blocks 432 and 434." *Smith*, col. 10, lines 16-19. "Dealership inventory and in-process vehicles are searched for a match or near match, as shown in block 436." *Id.*, lines 19-20. **Thus, even if *Smith* arguably teaches or suggests the "filter service module" or "configuration service module" as recited in Claim 1, *Smith* cannot teach both because *Smith* teaches only one (1) relevant process of locating a vehicle.** *Smith* does teach that Figure 5 depicts an alternative method of searching for and locating a vehicle. *Id.* lines 14-15. However, the alternative in Figure 4 is the same as Figure 5 with regard to the data received and processed to locate a vehicle, i.e. Block 432 is identical to Block 402 and Block 434 is identical to Block 404.

Accordingly, Applicants respectfully request withdrawal of the rejection of Claim 1 and withdrawal of dependent Claims 4-6, 13, 15-19 and 73 for at least the same reasons as Claim 1.

(II) Claim Rejection - 35 U.S.C. § 103

Claim 3 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Smith and official notice as applied to claim 1 and further in view of Neuborne et al. "Branding on the Net: The Old Rules Don't Apply. So How Do You Hustle Those Wares Online?"

Applicants respectfully request withdrawal of the rejection of dependent Claim 3 for at least the same reasons as Claim 1

(III) Claim Rejections - 35 U.S.C. § 103

Claims 7-12 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Smith and official notice as applied to claim 6 and further in view of the Microsoft Press Computer Dictionary.

Applicants respectfully request withdrawal of the rejection of dependent Claims 7-12 for at least the same reasons as Claim 1.

(IV) Claim Rejections - 35 U.S.C. § 103

Claims 20-23 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Smith and official notice as applied to claim 19 and further in view of the Microsoft Press Computer Dictionary.

Applicants respectfully request withdrawal of the rejection of dependent Claims 19 and 20-23 for at least the same reasons as Claim 1

(V) Claim Rejections - 35 U.S.C. § 103

Claims 24-29, 37, 39-43, and 74 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Smith and in view of official notice.

Claim 24 also recites two distinct processes that "identify one or more of the pre-generated product configurations" that are conditioned upon the type of data received. More specifically, Claim 24 recites in part:

> process, if the product related data is **attribute information**, the received product related data in accordance with product configuration information in order to identify one or more of the pre-generated product configurations stored in a database that meet requirements of the received attribute information;
>
> and
>
> identify one or more of the pre-generated product configurations that corresponds to the received product related data, if the product related data is **product identifier information**.

Accordingly, since *Smith* teaches and suggests only one (1) process of identifying a product, as demonstrated with regard to Claim 1, *Smith* cannot teach or suggest the two (2) distinct processes of Claim 24.

Applicants respectfully request withdrawal of the rejection of Claim 24 and withdrawal of the rejection of dependent Claims 25-29, 37, 39-43, and 74 for at least similar reasons as Claim 1.

(VI) Claim Rejections - 35 U.S.C. § 103

Claims 30-35 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Smith and official notice as applied to claim 29 and further in view of the Microsoft Press Computer Dictionary.

Applicants respectfully request withdrawal of the rejection of dependent Claims 30-35 for at least the same reasons as Claim 24.

(VII) Claim Rejections - 35 U.S.C. § 103

Claims 45-48 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Smith and official notice as applied to claim 29 and further in view of the Microsoft Press Computer Dictionary.

Applicants respectfully request withdrawal of the rejection of dependent Claims 45-48 for at least the same reasons as Claim 24.

(VIII) Claim Rejections - 35 U.S.C. § 103

Claims 51-53, 57-59, and 64-69 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Smith in view of official notice.

Claim 51 also recites two distinct processes that "identify one or more of the pre-generated product configurations" that are conditioned upon the type of data received. More specifically, Claim 51 recites in part:

> processing, if the product related data is **attribute information**, the received product related data in accordance with product configuration information in order to identify one or more of the pre-generated product configurations stored in a database that meet requirements of the received attribute information;
>
> and

identifying one or more of the pre-generated product configurations that corresponds to the received product related data, if the product related data is **product identifier information**.

Accordingly, since *Smith* teaches and suggests only one (1) process of identifying a product, as demonstrated with regard to Claim 1, *Smith* cannot teach or suggest the two (2) distinct processes of Claim 51.

Applicants respectfully request withdrawal of the rejection of Claim 51 and withdrawal of the rejection of dependent Claims 52, 53, 57-59, and 64-69 for at least similar reasons as Claim 51.

(IX) Claim Rejections - 35 U.S.C. § 103

Claims 54-56 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Smith and official notice as applied to claim 51 and further in view of the Microsoft Press Computer Dictionary.

Applicants respectfully request withdrawal of the rejection of dependent Claims 54-56 for at least the same reasons as Claim 51.

(X) Claim Rejections - 35 U.S.C. § 103

Claims 60 and 61 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Smith and official notice as applied to claim 57 and further in view of the Microsoft Press Computer Dictionary.

Applicants respectfully request withdrawal of the rejection of dependent Claims 60 and 61 for at least the same reasons as Claim 51.

(XI) Claim Rejection - 35 U.S.C. § 103

Claim 62 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Smith and official notice as applied to claim 51 and further in view of Neuborne.

Applicants respectfully request withdrawal of the rejection of dependent Claim 62 for at least the same reasons as Claim 51.

(XII) Claim Rejections - 35 U.S.C. § 103

Claims 70 and72 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Smith in view of official notice.

Claim 70 also recites two distinct processes that "identify one or more of the pre-generated product configurations" that are conditioned upon the type of data received. More specifically, Claim 51 recites in part:

> means for processing, if the product related data is **attribute information**, the received product related data in accordance with product configuration information in order to identify one or more of the pre-generated product configurations stored in a database that meet requirements of the received attribute information;
>
> and
>
> means for identifying one or more of the pre-generated product configurations that corresponds to the received product related data, if the product related data is **product identifier information**.

Accordingly, since *Smith* teaches and suggests only one (1) process of identifying a product, as demonstrated with regard to Claim 1, *Smith* cannot teach or suggest the two (2) distinct processes of Claim 70.

Applicants respectfully request withdrawal of the rejection of Claim 70 and withdrawal of the rejection of dependent Claim 72 for at least similar reasons as Claim 70.

(XIII) Claim Rejection - 35 U.S.C. § 103

Claim 71 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Smith and official notice as applied to claim 70 and further in view of Neuborne.

Applicants respectfully request withdrawal of the rejection of dependent Claim 71 for at least the same reasons as Claim 70.

CONCLUSION

In view of the amendments and remarks set forth herein, Applicant respectfully submits that all pending claims are in condition for allowance. Accordingly, Applicant requests that a Notice of Allowance be issued. Nonetheless, should any issues remain that might be subject to resolution through a telephone interview, the Examiner is requested to telephone the undersigned at 512-338-9100.

I hereby certify that this correspondence is being deposited with the United States Postal Service as First Class Mail in an envelope addressed to: Mail Stop RCE, COMMISSIONER FOR PATENTS, P.O. Box 1450, Alexandria, VA 22313-1450, on January 6, 2006.

_____ 1-6-2006
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